

THE **OUTSIDE** IS IN US ALL.

Region 2 3201 Spurgin Road Missoula, MT 59804 November 3, 2021

Dear Interested Public:

Thank you for your thoughtful reviews and comments on the Draft Environmental Assessment (EA) for a Montana Fish, Wildlife and Parks (FWP) proposal to develop approximately 1.5 acres of private land (encumbered by an FWP Conservation Easement) along upper Rock Creek for the purpose of providing safe, legal public access to Rock Creek, which would include improvements associated with a fully-developed Fishing Access Site (FAS). The site is approximately 14 miles west of Philipsburg in Granite County.

Enclosed is a decision notice (DN) in which I explain my rationale for approving the proposed action to proceed with the development of the Westslope FAS. Upon completion of the public involvement process and by including this DN and the updates herein, FWP accepts the draft EA as final. The decision document also includes all public comment on the proposed development and explains how FWP considered this comment in formulating a recommendation.

Please feel free to contact me at 406-542-5500 with any questions you may have. Thank you for your interest and participation.

Sincerely,

Randy Árnold

Regional Supervisor

RA/sr

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Decision Notice for the Draft Environmental Assessment: Westslope Fishing Access Site Proposed Development

Region 2 FWP, 3201 Spurgin Road, Missoula, MT 59804; 406-542-5500 November 2021

PROPOSAL FROM DRAFT EA

Montana Fish, Wildlife & Parks (FWP) proposes to develop the approximately 1.5 acres of private land (encumbered by an FWP Conservation Easement) along Rock Creek for the purpose of providing safe, legal public access to upper Rock Creek, which would include improvements associated with a fully-developed Fishing Access Site (FAS), to be called Westslope FAS. The site is approximately 14 miles west of Philipsburg in Granite County. Currently, parking of vehicles and trailers is concentrated on Highway 348 (Marshall Creek Road) and Upper Rock Creek Road; pioneered boat ramps exist on Upper Rock Creek Road. This proposal moves use to the FAS and reduces traffic congestion and streambank degradation. Proposed developments include: designated gravel parking area, single-wide concrete boat ramp, gravel access road, concrete vault latrine, boundary and privacy fencing, and informational signs. Development of the site would provide the only developed FWP-managed FAS on Rock Creek, providing legal access to this popular stream for fishing, floating, wildlife viewing, and picnicking.

The property would be managed under existing FWP public-use regulations. Management of the FAS would include routine maintenance, control of vehicles and firearms, and other accepted FWP FAS and recreation area management rules and regulations. Protection of the natural resources, the health and safety of visitors, and consideration of neighboring properties would all be considered and incorporated into development plans for this site.

The FAS would be for day-use only, and overnight camping would not be allowed on the site. Development of Westslope FAS would provide safe and legal public access to Rock Creek for fishing and floating and provide additional recreational opportunities for walking, picnicking, and wildlife viewing. A key component of this proposed action is to substantially improve safety conditions for both vehicular traffic and pedestrians. Currently the area lacks the organization and safety control measures of a developed site. FWP desires to correct and develop a site with multiple safety, environmental and organizational issues for the recreating public. (Above is a shortened version of the proposal; please refer to the draft EA¹ for full details.)

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¹ Available on FWP's website at https://fwp.mt.gov/public-notices/news/2021/jun/0515-westslope-fishing-access-site-proposed-development-draft-ea (accessed 12 Oct 2021).

Alternative A: No Action

If no action was taken, and a 1.5-acre parcel of private land along Rock Creek was not developed and managed as an FAS (Westslope), anglers, floaters and boaters would continue to launch and take out boats and rafts at the pioneered boat launches and park in the pioneered parking areas. Sediment delivery to Rock Creek from the pioneered boat launches and parking areas would continue, reducing water quality and potentially impacting habitat for the Threatened bull trout and westslope cutthroat trout, a Montana Species of Concern. Public access for recreational opportunities for boating, fishing, floating, picnicking, wildlife viewing, and walking along Rock Creek would also continue to be limited in this area. Vehicular traffic flow, constriction of vehicle passage and pedestrian safety would remain in a problematic and unsafe condition in the general area of the site. Environmental conditions would be expected to worsen, and the site would remain unmanaged and unorganized.

Alternative B: Proposed (Preferred) Action

FWP proposes to develop approximately 1.5 acres of private land along Rock Creek for the purpose of providing safe, legal public access to Rock Creek, which would include improvements associated with a fully developed FAS. Proposed developments include a designated gravel parking area, a single-wide concrete boat ramp, a gravel access road, a concrete vault latrine, boundary and privacy fencing, and informational signs. Development of the site would provide the only developed FWP-managed FAS on Rock Creek, a popular "blue ribbon" stream. Improved safety conditions for both vehicular traffic and pedestrians would result. The action would improve environmental conditions and would provide a managed, organized recreation site for the public.

PROPOSAL UPDATES

The following are updates to the **Anticipated Schedule** (section I.5 in the draft EA) for the Westslope FAS development project, compared to the original description in the draft EA. (Deletions in strikethrough, additions are <u>underlined</u>):

Estimated Public Comment Period: June-July (30 days) 2021

Estimated Decision Notice: July 2021 November 2021

Commission Approval Requested to Proceed: August 2021 ² Estimated Commencement Date: August-September 2022

Estimated Completion Date: October 2022

Current Status of Project Design (% complete): 65%

PUBLIC REVIEW PROCESS

Montana Fish, Wildlife & Parks is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and to make a decision based on this information. FWP released a draft environmental assessment (Draft EA) for public review of this proposal (Westslope Fishing Access Site Proposed Development), and it was available for public review and comment for a 39-day period from June 15 through July 22, 2021. The Draft

² Fish & Wildlife Commission approval is not required for this FAS development proposal.

EA was also posted on FWP's website http://fwp.mt.gov ("Public Notices") for that same time period, and comments could be submitted to Region 2 FWP via mail or email.

Legal notices for the availability of the Draft EA were published twice each in the *Independent Record* (Helena, June 9 & 10), *Missoulian* (June 8 & 9), and *Philipsburg Mail* (June 10 & 17) newspapers. FWP distributed 20 printed copies of the EA, and 50 email notifications of the EA's availability, to adjacent landowners and interested individuals, groups and agencies. A statewide *News Release* was distributed June 21, 2021 to a standard list of media outlets interested in FWP issues.

PUBLIC COMMENT

Summary of Public Comment

FWP received 6 comments (5 emailed and 1 mailed) regarding the proposed development proposal for Westslope FAS. All comments received are compiled in the Appendix.

- Two comments were from sportsmen's groups (Anaconda Sportsman's Club and Montana Trout Unlimited [Missoula]); both sportsmen's groups supported the proposal.
- Four comments were from individuals; 3 supported and 1 opposed the development proposal. Individuals making comments included 2 from Missoula and one each from Anaconda and Helena.
- In summary, 5 commenters supported, and 1 commenter opposed the development project.

Comments received [numbers in brackets refer to the Commenter # in the Appendix] in support of the proposed action included (paraphrased):

- It will help with the parking and safety of the road. [2]
- It will put the public in a designated area that provides parking and a boat launch, making it safer than "do as you please parking and boat launching." [3]
- This project under Alternative B has practical benefit to this section of Rock Creek, minimizing traffic and parking congestion, protecting public safety, providing quality public access, and ensuring the long-term conservation for aquatic and associated riparian benefits. [4.3]
- Specifically, MTU [Montana Trout Unlimited] believes that the benefits of decreased erosion and sedimentation from this development will promote habitat integrity for native Westslope Cutthroat and Bull Trout. Thank you for your work to develop and pursue this project in the Rock Creek drainage. [4.3]
- I am very in favor of this new FAS and think it will be a great addition to the recreation opportunities in this area. [6.1]
- Thank you to all the FWP employees who have worked hard to make this project happen. [1.3]

Comments received that questioned aspects of, or objected to, the proposed action included:

- It is long past time for this new boat ramp to be developed. It has been more than 20 years since the FWP conservation easement went into effect, and in that time the exponential growth of floating use has created noticeable damage to the west bank of the river.
- I am TOTALLY OPPOSED to the development (over-development) of the Rock Creek FAS as planned. There are many, many reasons, but suffice it to say you are planning on recreating the user conflict nightmare you're now dealing with on the Upper Madison only on much smaller, shallower, and narrower Rock Creek.

Response to Public Comment

The following comments and FWP responses encompass specific questions, suggestions or comments received during the public comment period. (The "Commenter #" is the Commenter # in the Appendix, sometimes with paragraph number/s also included.)

<u>Commenter 1.2</u>: Furthermore, I would like to say that it is long past time for this new boat ramp to be developed. It has been more than 20 years since the FWP conservation easement went into effect, and in that time the exponential growth of floating use has created noticeable damage to the west bank of the river.

<u>FWP Response</u>: Thank you for your patience. The original easement only had the allowance for six parking spots and didn't seem worth building. Working through the issues of amending an easement took a long time. Our hope is that the current easement and the development of Westslope FAS it allows will be more appropriate.

<u>Commenter 4.4</u>: We should not believe that simply building more parking lots is a long-term solution to increasing water based recreational use. As the demands on our recreational resources continue to rapidly grow, FWP will need to convene diverse stakeholders to comprehensively and responsibly manage recreation demands on our most popular streams and rivers in creative ways that think outside of the "more pavement" box.

<u>FWP Response</u>: We agree that building this site is not a solution to growing recreational use. The objective of this project was to move existing parking and boat launching occurring on the highway and county road to an existing, undeveloped area designated for that purpose. As evidenced by the high use of the area without a developed FAS, we anticipate the effect of our development will be primarily to move users to our site.

<u>Commenter 4.4:</u> We believe that issues around parking on both Rock Creek Road and Highway 348 will likely persist, even with this proposed development, and FWP and Granite County need to start taking enforcement of these issues seriously. If that requires more formal partnerships or new sources of funding to provide the support needed, FWP should be holding those conversations with stakeholders sooner rather than later.

<u>FWP Response</u>: We agree that parking on the highway and county road will likely persist during the busiest times, and we have discussed the problem with Granite County. It may become more palatable to manage parking on the highway and county road after the FAS is developed and provides an alternative to the current access.

<u>Commenter 5a.</u> You are proposing creating an enormous user conflict situation with absolutely NO plan on how to deal with it. [5a.2]

I have fished Rock Creek for 45 years and the upper reaches of the stream are NO PLACE for drift boats or rafts. Why? Because one party in a drift boat will put the fish down for however many anglers are already downstream wade fishing – and too bad if one happens to follow FWP's own angler courtesy guidelines and allows fishing space between anglers so no one gets crowded – the floaters will go right through the middle of however many anglers they may encounter in miles of river. [5a.5]

...– and simply close the section upstream from the Hog Back to float fishing. If they want to float down where the stream is larger due to tributaries contributing water, that might be acceptable. But upstream of there the stream is simply too small to accommodate the recreational burden you're planning to put on it by over-developing what should be a walk-in only FAS. [5a.8]

What your proposal does is first develop parking for 14 truck-trailer rigs. But what happens then? As you certainly must know from virtually every other Fishing Access Site in the state that has launch ramps for boats/rafts on trailers, eventually those trailers have to get downstream to the take out. On Rock Creek, you're about to create an incredible problem with empty trailers bouncing along a minimally-maintained narrow dirt road to what take-out? [5a.13]

This seems to be a very poor proposal for all the reasons mentioned above. And while there are few permanent residences along this road, I suspect they will not be thrilled with the noise and dust anymore than the wade anglers will be thrilled with drift boats and rafts ruining their fishing experience down the entire length of the river. [5a.16]

The simplest solution here – and what FWP should actually do – is simply close the narrow upper stretch of Rock Creek to float fishing. You do it on the Madison for good reason – and you should do it here, too. [5a.17]

Floating downstream from the Hogback where the river is wider and deeper might be acceptable, although you're still dealing with the total disruption of wade anglers by the floaters. Truth is, Rock Creek is too dang little to accommodate float fishing in most of its upper reaches and should be managed for the majority of the anglers – who have and continue to fish Rock Creek as it should be fished, by wading. [5a.18]

Thanks for the opportunity to comment, but this one should go back in the drawer and the money should be better spent taking care of the noxious weeds at existing FAS as required by Montana's Good Neighbor Policy law. There are far, far too many "unintended consequences" to this proposal and what should be done is to re-vegetate and close off the "pioneered launch sites" and provide minimal improvement to the FAS for "carry in" launch only. [5a.19]

...the Good Neighbor Policy REQUIRES that maintenance takes precedent over development at ALL state parks and fishing access sites...and this is certainly not maintenance, just the opposite. [5a.1]

<u>FWP Response</u>: We anticipate that the development of the FAS will not result in significant increased use compared to if it were not built. High and increased use is already occurring. The objective is to provide a better alternative for parking and launching a boat. Addressing the parking outside the FAS is a more reasonable request when users are given an alternative.

Managing floater-wader interaction on Rock Creek is currently done by closing fishing from boats from July 1 to November 30. Alternatives to this approach could be discussed through our river recreation rule process. The proposed FAS development does not preclude these discussions. The decision to offer a boat ramp was made because that's the kind of use happening now, and not building a boat ramp would continue to encourage launching boats from the county road. We chose to manage for the current use situation and its parking and boat launching issues and accept that changes may be made.

Granite County manages dust abatement around residences, and we contribute funds on occasion for areas where angler use is high. Vehicles and trailers already use the road, so we don't expect management of road conditions to change.

Maintenance of existing FAS sites is where FWP Fisheries currently spends most of its time and money. Our caretaking staff, maintenance staff, ranger staff and managers allocate most of their time and funding to existing sites, as well as resolving issues with adjoining neighbors and neighborhood residents. On a statewide basis few new sites have been acquired in the last couple decades. This FAS has taken several decades to work out a functional development plan for a variety of reasons. This site has been used for many years in an uncontrolled setting, resulting in maintenance issues. We look therefore, at the development of this site as maintaining the resources surrounding the site—i.e., the streambank, which is currently eroding due to a lack of a designated boat-ramp location, caring for the remaining vegetation in the area of the current uncontrolled pioneered launch areas, maintaining our policy of providing safe access and parking, and providing sanitary toilet facilities.

<u>Commenter 5b</u>: The information below [Hooper 2021], addresses the negative effect [of float fishermen] that removing woody debris from Rock Creek to enable floating has on bull trout, a species listed as threatened under the Endangered Species Act for more than two decades. . . it's just another reason why FWP should not develop a large Fishing Access Site to enable even more float fishing on Rock Creek.

<u>FWP Response</u>: The illegal cutting of woody debris from the creek should be addressed. However, it doesn't necessarily need to exclude floating. Some, if not most, of the woody debris could be cut in a way to allow floater use and protect fish habitat. To work out these solutions, floaters should be working with the landowners and land management agencies whose land the woody debris is on to get approval to do the work, as well as permitting entities. Managing the illegal cutting of woody debris by restricting floating is another way to address the issue but would likely meet strong resistance from people who enjoy floating.

The FAS is unlikely to change the amount of floating on Rock Creek compared to what would occur without it. In addition, the number of floaters there are currently already modifying the wood debris causing floating issues, so we don't believe that more wood cutting will happen because of the FAS even if floating does increase.

FWP believes a good first step on this issue is to inform floaters of the importance of wood to fish habitat, the current regulations regarding the cutting of wood in Rock Creek, and how to comply with these regulations.

DECISION AND RECOMMENDATION

Based upon the Draft EA and the applicable laws, regulations, and policies, I have determined that the proposed action will not have negative effects on the human and physical environments associated with this project. Therefore, I conclude that the EA is the appropriate level of analysis, and the preparation of an Environmental Impact Statement is unnecessary.

Five commenters supported the proposed action, and 1 commenter opposed the proposed action. Commenters asked questions or raised issues about the proposed action, which FWP addressed in this DN. No concerns were raised that FWP believes would bring the environmental analysis into question. Therefore, by notification of this Decision Notice (DN) and the proposal updates described herein, the draft EA is hereby made the final EA.

Based on the analysis in the draft EA and the public comment received, I have selected the "Proposed Action" (Alternative B). FWP will develop Westslope FAS as proposed, with work expected to begin August or September 2022.

In accordance with FWP policy, an appeal may be made by any person who has either commented in writing to the department on the proposed project, or who has registered or commented orally at a public meeting held by the department on the proposed project, or who can provide new evidence that would otherwise change the proposed plan. An appeal must be submitted to the Director of FWP in writing and must be postmarked or received within 30 days of this decision notice. The appeal must describe the basis for the appeal, how the appellant has previously commented to the department or participated in the decision-making process, and how the department can provide relief. The appeal should be mailed to: Director, MT Fish, Wildlife & Parks, PO Box 200701, (1420 East 6th Avenue,) Helena, MT 59620-0701.

Randy Arnold	Date	
Region 2 Supervisor		
Montana Fish Wildlife & Parks		

APPENDIX

All comments for the draft EA and proposal to develop Westslope FAS on approximately 1.5-acres of private land (encumbered by an FWP Conservation Easement) along upper Rock Creek in Granite County. Comments were received by FWP during the comment period of June 15 through July 22, 2021. (Comments received via: E = email, M = mail.)

Com- men-		Para-		
ter# Via		graph 1	I would like to voice my strong support for the proposed development of this fishing access site.	
ı	С	2	Furthermore, I would like to say that it is long past time for this new boat ramp to be developed. It has been more than 20 years since the FWP conservation easement went into effect, and in that time the exponential growth of floating use has created noticeable damage to the west bank of the river.	
		3	Thank you to all the FWP employees who have worked hard to make this project happen.	
2	E		I think this would be a great addition to rock creek. It will help with the parking and safety of the road. I am in favor of this project.	
3	E		The Anaconda Spotsmen's Club supports this project. As the project's description says it. It will put the Public in a designated area that provides parking and a Boat Launch making it way more safer than do as you please parking and boat launching.	
4	E	i	Please find attached public comments regarding the proposed development at the Westslope Fishing Access Site west of Philipsburg. Of course, do not hesitate to reach out to us if you have questions or need additional information. Thank you in advance for your consideration.	
		1	Thank you for the opportunity to provide written public comments on the proposed development at the newly named Westslope Fishing Access Site (FAS) west of Philipsburg conducted by the Montana Department of Fish, Wildlife and Parks (FWP). We have reviewed the proposal and associated draft Environmental Assessment, and we wish to go on record supporting this project under Alternative B.	
		2	Founded in 1964, Montana Trout Unlimited (MTU) is the only statewide grassroots organization dedicated solely to conserving, protecting, and restoring Montana's coldwater fisheries. MTU is comprised of 13 chapters across the state and represents approximately 4,500 TU members. Many of our members are conservation-minded anglers who have an active interest in the health and recreational values of our state's rivers and streams.	
		3	We believe this project under Alternative B has practical benefit to this section of Rock Creek, minimizing traffic and parking congestion, protecting public safety, providing quality public access, and ensuring the long-term conservation for aquatic and associated riparian benefits. Specifically, MTU believes that the benefits of decreased erosion and sedimentation from this development will promote habitat integrity for native Westslope Cutthroat and Bull Trout. Thank you for your work to develop and pursue this project in the Rock Creek drainage.	
		4	MTU's support for this good project does come some caveats moving forward. While this project is a responsible and scale appropriate response to resolving conflicts, promoting access, and benefiting habitats, we should not believe that simply building more parking lots is a longterm solution to increasing water based recreational use. As the demands on our recreational resources continue to rapidly grow, FWP will need to convene diverse stakeholders to comprehensively and responsibly manage recreation demands on our most popular streams and rivers in creative ways that think outside of the "more pavement" box. Finally, we believe that issues around parking on both Rock Creek Road and Highway 348 will likely persist, even with this proposed development, and FWP and Granite County need to start taking enforcement of these issues seriously. If that requires more formal partnerships or new sources of funding to provide the support needed, FWP should be holding those conversations with stakeholders sooner rather than later.	
		5	We urge your support for this project. Please do not hesitate to contact us with any questions, or if you need additional information regarding the comments that we have submitted (via email at clayton@montanatu.org or by phone at 406-543-0054). Again, we thank you for the opportunity to provide public comment.	

E	i	Please find attached my comments on the proposal to develop a large Fishing Access Site on Upper Rock Creek.
	ii	Thanks for the opportunity to comment, but having fished that stretch of Rock Creek for 45 years, I'm afraid developing boat launches for float fishing that narrow little stream is a very bad ideaespecially for the majority of anglers who are, in fact, wading.
	iii	Thanks for getting this to Randy.
	1	I'll get right to it, I am TOTALLY OPPOSED to the development (over-development) of the Rock Creek FAS as planned. There are many, many reasons, but suffice it to say you are planning on recreating the user conflict nightmare you're now dealing with on the Upper Madison – only on much smaller, shallower, and narrower Rock Creek. Additionally, apparently you have not checked the law lately, but the Good Neighbor Policy REQUIRES that maintenance takes precedent over development at ALL state parks and fishing access sitesand this is certainly not maintenance, just the opposite.
	2	You are proposing creating an enormous user conflict situation with absolutely NO plan on how to deal with it. And just like the Madison, once you create the problem of overuse, especially by the ever rapacious and often extremely rude "guides," the best you can do is appoint various committees of "stakeholders" to hammer out some sort of management plan – the exact thing you're getting paid to do, but are happy to pawn off to various commercial interests who endlessly quash whatever limitations on use that might be required to preserve not only the resource, but the enjoyment of the majority of anglers (who are not, by the way, floating).
	3	Let's see, didn't the Upper Madison plan just get postponed for another two years without a single credible reason? Yep. It did. Nice that it took years of fruitless meetings and staff work only to have it ignored and implementation effectively halted. "Rule capping outfitters, guides on Madison River delayed" [https://helenair.com/outdoors/rule-capping-outfitters-guides-on-madison-river-delayed/article_df7890cc-a34b-5779-a56f-b7332b2d0750.html] BRETT FRENCH Helena Independent Record Jun 25, 2021
	4	Apparently no one at FWP has noticed that the Smith River was already closed to floating – in mid-June. Yet, you think Rock Creek can and should be floated in June, despite the obvious impacts Montana is now suffering from global warming – which include low flows, high temperatures, and dying trout. So you're planning on spending \$200,000+ to develop a large FAS on a tiny stream to provide drift boat launching for an ever-decreasing period of time between "rur off" (you remember that, don't you?) and flows that are too low to even get a drift boat or raft down the stream.
	5	I have fished Rock Creek for 45 years and the upper reaches of the stream are NO PLACE for driboats or rafts. Why? Because one party in a drift boat will put the fish down for however many anglers are already downstream wade fishing – and too bad if one happens to follow FWP's own angler courtesy guidelines and allows fishing space between anglers so no one gets crowded – the floaters will go right through the middle of however many anglers they may encounter in miles of river.
	6	And the assertion that Rock Creek can't be waded at "high water" in the EA is absolute BS. Apparently all the times over more than four decades that I waded it at high water were impossibl according to your pitiful rationalization for building a 14-space truck-trailer parking lot on a stream you can easily throw a stone across.
	7	Of course Rock Creek can be waded – but as usual in Rock Creek, the key to wading it high or low water is to take extreme care because it's a free stone stream with large round and slippery rocks in and on the river bed. Hence the name, ehh?
	8	The simple truth is that you ought to put the quarter million bucks this is going to cost into actual stream improvements – not stream abuse developments – and simply close the section upstream from the Hog Back to float fishing. If they want to float down where the stream is larger due to tributaries contributing water, that might be acceptable. But upstream of there the stream is simp too small to accommodate the recreational burden you're planning to put on it by over-developing what should be a walk-in only FAS.
	9	Perhaps your "planners" have never spent a day fishing Rock Creek and had drift boats go through the section of the stream they're fishing – it would seem so from your clueless proposal. Let me tell you, it is totally inappropriate and severely degrades the angling experience to have drift boats floating by within casting distance of the shore.
	10	For one thing, say good-bye to whatever fish you happened to be workingthey'll be gone when drift boat floats over them, scared shitless.
	11	Road impacts – dust, noise, degradation

		12	Anyone who has driven the Rock Creek road knows how dusty it usually is and how quickly it becomes washboard. I've done it hundreds of times, so this is not conjecture on my part.
		13	What your proposal does is first develop parking for 14 truck-trailer rigs. But what happens then? As you certainly must know from virtually every other Fishing Access Site in the state that has launch ramps for boats/rafts on trailers, eventually those trailers have to get downstream to the take out. On Rock Creek, you're about to create an incredible problem with empty trailers bouncing along a minimally-maintained narrow dirt road to what take-out?
		14	In the meantime, as you surely know, the road is in close proximity to Rock Creek for much of the way down its entire length. That means the dust, which will be considerable, will be landing in Rock Creek and become sediment. That's an impact to the stream which, like the increased road use and lack of "end point" for the float seems to have escaped analysis. But for those camping along the stream – and there are undeveloped sites – will be likewise find themselves dealing with clouds of dust and noise from the empty trailers rumbling down the road.
		15	Conclusion
		16	This seems to be a very poor proposal for all the reasons mentioned above. And while there are few permanent residences along this road, I suspect they will not be thrilled with the noise and dust anymore than the wade anglers will be thrilled with drift boats and rafts ruining their fishing experience down the entire length of the river.
		17	The simplest solution here – and what FWP should actually do – is simply close the narrow upper stretch of Rock Creek to float fishing. You do it on the Madison for good reason – and you should do it here, too.
		18	Floating downstream from the Hogback where the river is wider and deeper might be acceptable, although you're still dealing with the total disruption of wade anglers by the floaters. Truth is, Rock Creek is too dang little to accommodate float fishing in most of its upper reaches and should be managed for the majority of the anglers – who have and continue to fish Rock Creek as it should be fished, by wading.
		19	Thanks for the opportunity to comment, but this one should go back in the drawer and the money should be better spent taking care of the noxious weeds at existing FAS as required by Montana's Good Neighbor Policy law. There are far, far too many "unintended consequences" to this proposal and what should be done is to re-vegetate and close off the "pioneered launch sites" and provide minimal improvement to the FAS for "carry in" launch only.
5b	E	1	The information below, which addresses the negative effect that removing woody debris from Rock Creek to enable floating has on bull trout, a species listed as threatened under the Endangered Species Act for more than two decades. Please include these in my comments since it's just another reason why FWP should not develop a large Fishing Access Site to enable even more float fishing on Rock Creek. I have also attached the Biological Opinion from which they came (Hooper 2021; pg 8 of 123). [A copy of Hooper 2021 is available from FWP upon request.]
		2	"Currently, the main factors limiting recovery of bull trout in Rock Creek are the extensive non- native fish communities throughout the system (mainly brown trout, brook trout and rainbow trout), combined with warmer than historic water temperatures. Warm water temperatures are a result of irrigation water withdrawals, climate change, potential drought years, agriculture, and grazing impacts in the middle and upper reaches on both private and Forest Service lands. A lack of large woody debris and overhead shade along the mainstem, caused by decades of grazing, a parallel road on major stream segments, and float fisherman (cutting trees out of the creek) has resulted in fewer large pools and a wider, shallower stream. Other chronic impacts, such as inadvertent fishing mortality, and poaching probably also contribute somewhat to the current population trend (USDA 2013)."
6	М	1	I am writing in support of the Westslope Fishing Access Site Proposed Development. I am very in favor of this new FAS and think it will be a great addition to the recreation opportunities in this
		2	area.
		2 3	area. Thank you. A Missoula Resident in support of more recreational opportunities in our great state!